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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

Plaintiff,

vs.

CITY OF PORTLAND,

Defendant.

Case No. 3:12-cv-02265-SI

DECLARATION OF DR. MARK LEYMON

I, Dr. Mark Leymon, submit the following declaration:

I am an Associate Professor of Criminology & Criminal Justice at Portland State University in Portland, OR, and I make this declaration in support of Mental Health Alliance's February 2020 Status Report. My statements are true to the best of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe them to be true.

1. I received my Doctorate and Masters in Sociology at the University of Oregon.
2. I am a quantitative research methodologist and justice policy researcher.

DECLARATION OF DR. MARK LEYMON IN SUPPORT OF MOTION

3. My research focuses on the effects of sentencing reforms on a number of fronts, most notably the consistent and pervasive racial and ethnic disparities in imprisonment. I have studied the connection between politics, the economy, and criminal justice policy and the impacts on people of color. My larger program of research focuses on studying the factors driving public policy changes and explaining their disproportionate impact on people of color.

4. I also work to develop more robust statistical models, including improved methodologies for conducting panel analysis.

5. I have reviewed the data and graphical illustrations of that data created by Mr. Michael Hopcraft, and agree with the conclusions therein. I reviewed the data, recreated the analysis, and generated graphs to confirm the accuracy of the data analysis and conclusions. I generated trendlines and tested the statistical significance of those trends related to use of force for mental health crisis, drug and alcohol, and transient cases. Finally, I generated 95% confidence ranges (confidence intervals) to demonstrate the predicted range where 95% of possible occurrences of use of force in a given quarter could fall.

I hereby declare that above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: February 13, 2020

A handwritten signature in black ink, appearing to read 'Mark Leymon', written over a horizontal line.

Mark Leymon